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21 IN THE UNITED STATES DISTRICT COURT  
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23 FOR THE NORTHERN DISTRICT OF CALIFORNIA  
24  
25 SAN JOSE DIVISION

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27  
28 IVAN VERNARD CLEVELAND,

29 Plaintiff,

30 v.

31 BEN CURRY, Warden, et al.,

32 Defendants.

33 C 07-2809 JF (PR)

34 DECLARATION OF  
35 SERGEANT ALANIS IN  
36 SUPPORT OF DEFENDANTS'  
37 MOTION FOR SUMMARY  
38 JUDGMENT

39 I, Sgt. Alanis, declare:

40 1. I am a correctional sergeant, and have worked for the California Department of  
41 Corrections and Rehabilitation (CDCR) for seventeen years. I am presently the curriculum  
42 liaison at CDCR's Richard A. McGee Correctional Training Center, a position I have held since  
43 2004. The training center provides mandatory training for all prospective CDCR correctional  
44 officers, and is the only center to provide such training. In my current position, I am familiar  
45 with the center's curriculum and policies. I am competent to testify to the matters set forth in  
46 this declaration, and if called upon to do so, I would and could so testify. I submit this

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1 declaration in support of Defendants' motion for summary judgment.

2       2. Training for clothed-body and unclothed-body searches is part of the curriculum for all  
3 students at the center. The training incorporates both lectures and documentation.

4       3. I have reviewed the declaration of Defendant Abanico filed in support of Defendants'  
5 motion for summary judgment, and find that Abanico's self-described body-search procedure  
6 conforms with the training given by the training center.

7       4. Searches can be considered physically intrusive. In particular, during clothed-body  
8 searches, correctional officers are instructed to cup the groin of male inmates to check for  
9 contraband, or to sweep across the groin. Correctional officers must also run their hands along  
10 inmates' inner thighs.

5. Some inmates are very hostile about being searched, complain of being disrespected or harassed, and may accuse searching officers of abusing authority.

13       6. But inmate searches are integral to promoting the safety and security of staff, inmates,  
14 the prison, and the public. Searches help to prevent dangerous contraband, inmate escapes, and  
15 theft among inmates.

16       7. Random clothed-body searches of inmates is mandated by the California Code of  
17 Regulations, title 15, section 3287(c), as well as the Department Operations Manual, sections  
18 52050.18.1-2.

19 I declare under penalty of perjury that the foregoing is true and correct of my own  
20 knowledge.

21 Executed March 28, 2008, in Galt, California.

A. Alanis SGT.  
Sgt. Alanis

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